

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** EPA's Methane Challenge and Natural Gas STAR Program

**OMB Control Number:** 2060-0722

**EPA ICR Number:** 2547.02

### **Abstract:**

This ICR revision proposes to significantly pare down the information reported to EPA's Natural Gas STAR and Methane Challenge Programs. Specifically, it proposes to remove all of the partnership-specific reporting elements, based on the Programs' changes to sunset the "Partnership" aspects of the programs. EPA proposes to retain one key element of the ICR, the Service Providers Directory.

The oil and natural gas industry is the second largest source of anthropogenic methane emissions in the U.S., according to the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022. Methane is the primary component of natural gas and a potent greenhouse gas. Since 1993, the US Environmental Protection Agency's (EPA) Natural Gas STAR Program has encouraged oil and natural gas companies to adopt cost-saving technologies and practices that improve operational efficiency and reduce methane emissions. This non-regulatory Program supported Partner companies in making voluntary efforts to implement recommended technologies and report related methane emissions reductions to EPA. In 2016, EPA launched a new program, the Methane Challenge Program. This Program leveraged the methane-reducing best practices and technologies developed by the industry and showcased through the Natural Gas STAR Program over the past 20+ years and created a mechanism for oil and natural gas companies to make ambitious, voluntary commitments to reduce their methane emissions. Methane Challenge Partners submitted detailed data to the Program each year so EPA, and the public, could track the progress Partners are making towards these commitments.

EPA has recently taken historic steps to tackle wasteful methane emissions from the oil and gas sector beyond voluntary action. The Inflation Reduction Act directed EPA to implement a suite of actions to swiftly reduce methane emissions through the creation of the Methane Emissions Reductions Program (MERP). On December 2, 2023, EPA announced final New Source Performance Standards and Emissions Guidelines (NSPS/EG) to regulate the oil and gas industry under the Clean Air Act, resulting in ambitious requirements to reduce methane from both new and existing sources. The Department of Transportation has also imposed requirements on the transmission segment including implementation of the PIPES Act of 2020.

In 2022, EPA announced the sunset of the Natural Gas STAR Program partnership agreements, implementation plans, and annual reporting. Based on the limited remaining potential for voluntary actions to reduce methane emissions, EPA will be sunsetting the Methane Challenge Partnership at the end of 2024. EPA will be transitioning the Natural Gas STAR Program outreach efforts to advance ambitious, sector-wide methane reductions through technical assistance and outreach under the Methane Emissions Reduction Program.

Therefore, based on these significantly reduced programmatic elements, for this revision of the Program ICR, EPA proposes to remove all partnership reporting data elements and partnership-related information collection forms for both the Methane Challenge Program and the Natural Gas STAR Program. This includes the removal of annual reporting forms, partnership agreements, and implementation plans. The sole programmatic element involving voluntary information collection that EPA plans to retain is the Oil and Gas Equipment and Service Providers Directory. This directory's purpose is to share information about service and technology providers that can facilitate methane emission reduction activities in the oil and gas sector. These changes will result in a significant overall decrease in burden for this ICR.

### Background: Natural Gas STAR Program

Since 1993, the Natural Gas STAR (NGS) Program worked with oil and natural gas companies across the value chain (i.e., the production, gathering & processing, transmission, and distribution segments), to remove barriers to implementing technologies and practices that reduce methane emissions. The NGS Program offered Partner companies flexibility to participate at whichever scale (e.g., number of facilities, number of emission sources, etc.) worked best for their operational context, business plan, and sustainability goals.

The Program was a collaboration of regional and national industry Partners that actively engaged in sharing Best Management Practices (BMPs) with one another, and other companies in the industry. This promoted the adoption of emission reduction technologies and practices by helping NGS Partners evaluate BMPs in the context of their current operations and implement them where cost effective. Implementation of these BMPs saved participants money, improved operational efficiency, and enhanced the protection of the environment. The goal of the Program was to foster collaboration, networking, and technical information sharing; Partner companies were encouraged to report their methane emissions reductions to EPA, but there is no specific commitment to do so.

Oil and natural gas companies joined the Program as Natural Gas STAR Partners by completing and submitting a Partnership Agreement that outlined responsibilities of the Partner company and EPA. The agreement committed a Natural Gas STAR Partner to evaluate methane emission reduction opportunities and to implement BMPs that reduce methane emissions. Partners could report annually on their voluntary actions and resulting emission reductions, though were not required to do so. EPA ended partner annual reporting, partnership agreements, and implementation plan elements of the Program in 2022.

### Background: Methane Challenge Program

In 2016, EPA launched the Methane Challenge (MC) Program. This Program was developed through extensive stakeholder engagement and with support from companies and trade organizations in the oil and gas industry. Methane Challenge expanded upon the key learnings made by NGS Partners and provided an innovative mechanism for oil and natural gas companies to make ambitious and quantifiable voluntary commitments to reduce methane emissions across their operations. The Program worked with oil and natural gas companies in the onshore production, gathering and boosting, processing, transmission and underground storage, and distribution segments.

Methane Challenge offered two commitment options for Partners. Both focused on reducing methane emissions across a company's operations using different approaches. In the Best Management Practice (BMP) Commitment Option, Partners committed to implement specific practices and technologies to reduce methane emissions from specific emission sources. In the ONE Future Emissions Intensity (ONE Future) Commitment Option, Partners committed to achieve a specified methane emission intensity target. Throughout the course of its commitment, the company had flexibility in determining which emission sources to mitigate and which practices/technologies to implement to achieve its target intensity rate. Companies could join one or both commitment options.

Companies became Methane Challenge Partners by completing and submitting a Partnership Agreement that outlined responsibilities of the Methane Challenge Partner company and EPA. In the BMP Partnership Agreement, a company committed to mitigate emissions from at least one methane emissions source using technologies/practices specified in the Program's Technical Document. In the agreement, the Partner would specify a start date and a target achievement year for its commitment(s). The achievement year must not have exceeded five [5] years from the commitment start date. ONE Future Commitment Partners committed to a segment-specific intensity target by a certain year. Collectively, the ONE Future Partners committed to a goal of reducing methane emissions across the natural gas value chain to 1% or less by 2025. The ONE Future collective and segment-specific intensity targets have been established by the ONE Future industry coalition. EPA collaborated with this group on the ONE Future commitment option, but the two are separate Programs.

The voluntary partnership agreement could be terminated by the Methane Challenge Partner or by EPA with no notice or penalties and no further obligation.

Methane Challenge Partners also agreed to submit an Implementation Plan within six [6] months of signing the Partnership Agreement and to annually report on their methane emissions, voluntary actions, and resulting emission reductions. Transparency through annual reporting was a key component of the Program, and a requirement for participation.

Program Partners reported annually to the EPA through the electronic Greenhouse Gas Reporting Tool (e-GGRT) system. EPA leveraged data reported to the Greenhouse Gas Reporting Program (GHGRP) through the Petroleum and Natural Gas Systems source category (Subpart W) to track Program activities. Partners also reported supplemental data to comprehensively track progress towards their source-specific commitments, including data that enabled Partners to highlight emission reductions achieved through voluntary action. Data elements to be reported were provided in detailed "Technical Documents" for each commitment option. Methane Challenge reports were due annually each fall (on a date to be specified by the EPA). A Partner was expected to begin reporting after its first full calendar year of participation in the Program. EPA compiled and publicly released (i.e., on the EPA website) all non-confidential data submitted to the Methane Challenge Program to track the progress of individual Partner companies in meeting their Program commitments.

To align with increased Agency regulations for reducing methane emissions from the oil and gas sector under the Inflation Reduction Act's Methane Emissions Reductions Program (MERP), EPA plans to sunset the Methane Challenge Partnership at the end of 2024.

## Other Activities:

In addition to the core Program data collection, EPA also tracked a few additional data elements that helped improve program implementation including changes to partner's contact information or changes in operating circumstances of a company.

Further, as a service to Partners, EPA also maintains a "[service provider directory](#)" to share information on services and technologies available to oil and natural gas companies seeking to reduce methane emissions from their operations. Service provider companies fill out a short form one time to be included on the directory. EPA does not endorse any company or product in the directory.

## **Supporting Statement A**

### **1. NEED AND AUTHORITY FOR THE COLLECTION**

*Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

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EPA developed previous versions of this ICR to obtain authorization to collect information from Partners of the Natural Gas STAR and the Methane Challenge Programs. This ICR renewal proposes significant revisions that drastically reduce respondent burden and cost, including the removal of all former partnership-related data collection such as partnership agreements, annual reporting forms, and implementation plans.

With this ICR revision, EPA seeks to collect information only from voluntary stakeholders who wish to provide information to be shared through the Natural Gas STAR Service Provider Directory.

### **2. PRACTICAL UTILITY/USERS OF THE DATA**

*Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

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EPA uses the information provided in the Service Provider Directory form to populate a database for the Directory displaying the information submitted via the form. This database is provided and maintained as a service to oil and gas industry stakeholders. EPA does not endorse any company or product in the Directory.

### **3. USE OF TECHNOLOGY**

*Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

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In collecting and analyzing the information associated with this ICR, EPA uses typical office equipment such as telephones, computers, and database and word processing software systems. Using information technology equipment will not reduce burden.

EPA ensures the accuracy and completeness of collected information by reviewing each submission.

#### **4. EFFORTS TO IDENTIFY DUPLICATION**

*Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

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The information to be obtained under this ICR is not collected by EPA or any other Federal agency.

#### **5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

*If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

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EPA has designed and streamlined its Service Provider Directory form to minimize respondent burden while obtaining sufficient and accurate information. The estimated burden cannot be further reduced for small entities.

#### **6. CONSEQUENCES OF LESS FREQUENT COLLECTION**

*Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

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For the Service Provider Directory, respondents may voluntarily submit the form at any time. EPA reviews the form submissions and updates the Directory on a regular basis.

#### **7. GENERAL GUIDELINES**

*Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.*

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The Natural Gas STAR Program does not anticipate any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

#### **8. PUBLIC COMMENT AND CONSULTATIONS**

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##### **8a. Public Comment**

*If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.*

This notice can be found in the Federal Register at 89 FR 48164.

One comment was received, which supported the removal of nearly all reporting requirements of the voluntary program and therefore the reduction of overall burden.

##### **8b. Consultations**

*Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with*

*representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

Since the last ICR Renewal, information collection procedures for both Programs are expected to decrease significantly. EPA consulted with the following former Implementation Managers regarding the proposed sunset of Methane Challenge:

### Former Methane Challenge ONE Future Partners:

Dawn Meyers  
Kinder Morgan  
370 Van Gordon St.  
Lakewood, CO 80228  
dawn\_meyers@kindermorgan.com  
(303) 914-7837

Dorian Afanador  
Southern Company Gas  
Ten Peachtree Place NE, 8th Floor  
Atlanta, GA 30030  
dlafanad@southernco.com  
(205) 257-6291

### Former Methane Challenge BMP Partners:

Kristen Jones  
Atmos Energy  
5420 LBJ Freeway, Suite 1800  
Dallas, TX 75240  
kristen.jones@atmosenergy.com  
(214) 240-1971

James Roush  
Consumers Energy Company  
1945 W. Parnall Rd.  
Jackson, MI 49201  
[James.roush@cmsenergy.com](mailto:James.roush@cmsenergy.com)  
(517) 788-1661

The feedback from former Program Implementation Managers supported the removal of nearly all partner-reported information, thereby significantly decreasing burden estimates.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

*Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.*

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The Natural Gas STAR Program did not provide any payments or gifts to respondents.

## **10. ASSURANCE OF CONFIDENTIALITY**

*Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.*

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This information is collected on a voluntary basis for inclusion in a public-facing Service Providers Directory. EPA makes clear that the Service Provider Directory was created to share information on service and technology providers that can facilitate methane emission reduction activities, not to endorse particular companies or products. Providing contact information and links to non-EPA websites does not constitute an endorsement by EPA or any of its employees. All user-submitted information is subject to the Freedom of Information Act.

## **11. JUSTIFICATION FOR SENSITIVE QUESTIONS**

*Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

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No sensitive questions are asked in the Service Provider Directory form. However, some information may be made available to the public as required by the Freedom of Information Act, 5 U.S.C. § 552.

## **12. RESPONDENT BURDEN HOURS & LABOR COSTS**

*Provide estimates of the hour burden of the collection of information. The statement should:*

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
  - *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
  - *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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### **12a. Respondents/NAICS Codes**

The following is a list of North American Industry Classification System (NAICS) Codes and associated industries that may be affected by information collection requirements covered under this ICR:

211130	Natural Gas Production and Gathering Lines
221210	Natural Gas Distribution
486210	Natural Gas Boosting Stations, Processing Plants, Transmission, and Storage
541100	Legal Services

**12b. Information Requested**

**Service Provider Directory**

As a service to the oil and gas industry, EPA maintains a “service provider directory” to share information on services and technologies available to oil and natural gas companies seeking to reduce methane emissions from their operations. EPA does not endorse any company or product in the directory. Contact information is provided to foster the exchange of information.

(i) Data items:

Third-party vendors (service providers) complete an on-line form providing contact information and a short description of their technology, product, or service to be added to the directory listing.

**12c. Respondent Activities**

Complete the form.

**12d. Respondent Burden Hours and Labor Costs**

**TABLE 1: AVERAGE ANNUAL BURDEN FOR A RESPONDENT, BY YEAR OF PARTICIPATION**

	<b>Respondent Annual Burden Hours First Year</b>	<b>Respondent Annual Burden Hours Subsequent Years</b>
<b>Service Provider Directory Respondent</b>	0.25	0.25

**TABLE 2: AVERAGE ANNUAL COST FOR A RESPONDENT, BY YEAR OF PARTICIPATION**

	<b>Respondent Annual Cost First Year</b>	<b>Respondent Annual Cost Subsequent Years</b>
<b>Service Provider Directory Respondent</b>	\$28	\$28

**13. RESPONDENT CAPITAL AND O&M COSTS**

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating,

*maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.*

*Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

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There are no capital/start-up costs or O&M costs associated with this information collection.

#### **14. AGENCY COSTS**

*Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

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##### **14a. Agency Activities**

Review form submissions and enter data in database

##### **14b. Agency Labor Cost**

\$379 per year

##### **14c. Agency Non-Labor Costs**

\$0

#### **15) REASONS FOR CHANGE IN BURDEN**

*Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.*

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The overall annual burden for respondents under this ICR number decreased from 4,859 hours in the previous ICR to 12.5 hours in this proposed revision ICR. This change is attributed to removing all reporting and recordkeeping requirements of the Natural Gas STAR and Methane Challenge Programs except for the Natural Gas STAR Program Service Provider Directory.

#### **16) PUBLICATION OF DATA**

*For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

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Information collected from respondents is reviewed by EPA, added to a database, and published to the Natural Gas STAR Program's Service Provider Directory website.

**17) DISPLAY OF EXPIRATION DATE**

*If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

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Not applicable

**18) CERTIFICATION STATEMENT**

*Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

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Not applicable